



U.S. Department of Justice

*United States Attorney
Southern District of New York*

April 19, 2023

By Certified Mail

The Honorable John P. Cronan
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Reclaim the Records et al., v. U.S. Dep't of State*, 23-cv-01650 (JPC)

Dear Judge Cronan:

This Office represents the U.S. Department of State (the "Government") in the above-referenced action brought under the Freedom of Information Act ("FOIA"). We write jointly with Plaintiffs Reclaim the Records and Alec Ferreti ("Plaintiffs") to seek an adjournment of the answer deadline because the parties are working to resolve this matter without judicial involvement.

The current deadline for Defendant to file an answer to Plaintiffs' Complaint is April 24, 2023. The parties are currently discussing the scope of the requested search. Because this is a FOIA case, we anticipate that this matter will either be resolved consensually, or through motions for summary judgment on any issues the parties are unable to resolve.

We therefore respectfully request that: (1) the Defendant's time to answer the Complaint be adjourned without date; and (2) that the parties be required to provide the Court with a written status update on or before May 19, 2023. If the parties agree upon the scope of the requested search, we will negotiate a production schedule and advise the Court of same. If we reach an impasse as to the scope of the requested search, we will propose a briefing schedule for motions for summary judgment.

We thank the Court for its consideration of this letter.

Respectfully,

BELDOCK LEVINE &
HOFFMAN LLP
Attorney for Plaintiffs

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: /s/ Jeff Kinkle
Jeff Kinkle
99 Park Avenue, PH/26th Floor
New York, New York 10016
Tel: (212) 277-5824
Jkinkle@blhny.com

By: /s/ Rebecca L. Salk
REBECCA L. SALK
Assistant United States Attorney
86 Chambers Street, Third Floor
New York, New York 10007
Tel.: (212) 637-2614
Rebecca.Salk@usdoj.gov